

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

---

IN RE: AQUEOUS FILM-FORMING )  
FOAMS PRODUCTS LIABILITY ) Master Docket No.: 2:18-mn-2873-RMG  
LITIGATION )  
 ) **This document relates to:**  
 ) See Exhibit A Attached Hereto  
)

---

**STIPULATION OF DISMISSAL OF RELEASED CLAIMS WITH PREJUDICE  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)(1)(A)(ii)**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs in the actions identified in Exhibit A attached hereto and Defendant 3M Company (“3M”) hereby stipulate and agree to a dismissal with prejudice of Plaintiffs’ claims against 3M that are “Released Claims” as defined in the Settlement Agreement between Public Water Systems and 3M Company dated June 22, 2023 (as subsequently amended), filed in *In re Aqueous Film-Forming Foams Products Liability Litigation*, MDL No. 2:18-mn-2873 (D.S.C) (the “Agreement”).

The parties further stipulate and agree that any claims asserted by the Plaintiffs against 3M that are preserved under § 11.1.2 of the Agreement are not dismissed. 3M shall retain all defenses with respect to any such claims, including the right to argue that the claims are not preserved and are released. Plaintiffs reserve their rights against all other Defendants in the actions identified in Exhibit A attached hereto.

Dated: January 9, 2025

By: /s/ Michael A. London

Michael A. London  
Tate J. Kunkle  
Gary J. Douglas  
Rebecca Newman  
Douglas and London PC  
59 Maiden Lane, 6th Floor  
New York, NY 10038  
Telephone: 212-566-7500  
Fax: 212-566-7501  
[gdouglas@douglasandlondon.com](mailto:gdouglas@douglasandlondon.com)  
[tkunkle@douglasandlondon.com](mailto:tkunkle@douglasandlondon.com)  
[rnewman@douglasandlondon.com](mailto:rnewman@douglasandlondon.com)

Respectfully submitted,

/s/ Richard F. Bulger

Richard F. Bulger  
MAYER BROWN LLP  
71 South Wacker Drive  
Chicago, IL 60606  
312-702-0600  
[rbulger@mayerbrown.com](mailto:rbulger@mayerbrown.com)

*Counsel for Defendant 3M Company*

By: /s/ Ned McWilliams

Ned McWilliams  
Levin Papantonio Rafferty 316 S Baylen  
Street, Suite 600  
Pensacola, FL 32502  
Telephone: 850-435-7186  
[nmcwilliams@levinlaw.com](mailto:nmcwilliams@levinlaw.com)

By: /s/ Kevin J. Madonna

Kevin J. Madonna  
KENNEDY & MADONNA, LLP  
48 Dewitt Mills Road Hurley, NY 12443  
Telephone: (845) 481-2622  
Facsimile (845) 230-3111  
[kmadonna@kennedymadonna.com](mailto:kmadonna@kennedymadonna.com)

By: /s/ John J. Driscoll

John J. Driscoll  
The Driscoll Firm, LLC  
1311 Avenida Ponce de Leon, 5th Floor  
San Juan, PR 00907  
Phone: (314) 932-3232  
Fax: (314) 932-3233  
[john@thedriscollfirm.com](mailto:john@thedriscollfirm.com)

By: /s/ *Kenneth A. Sansone*

SL Environmental Law Group PC  
175 Chestnut Street  
San Francisco, CA 94133  
Phone: (603) 227-6298  
Fax: (415) 384-8333  
[ksansone@slenvironment.com](mailto:ksansone@slenvironment.com)

By: /s/ *Robert A. Bilott*

Taft Law Firm  
50 E. RiverCenter Blvd., Suite 850  
Covington, KY 41011  
Phone: (513) 381-2838  
Fax: (513) 381-0205  
[bilott@taftlaw.com](mailto:bilott@taftlaw.com)

*Counsel for Plaintiffs Listed on  
Exhibit A*